

# Site-Wide EIS

## Employee Information Quarterly

Fall 1995 Vol. 1, No. 2

Information for employees about the U.S. Department of Energy's Site-Wide Environmental Impact Statement for LANL

### GLOSSARY

**DOE**  
Department of Energy

**EIS**  
Environmental Impact Statement, a written report documenting a formal analysis of major federal actions that could result in significant impacts to the human environment

**GRAM, Inc.**  
contractor hired by DOE to perform the analysis of impacts and prepare the site-wide EIS

**NEPA**  
National Environmental Policy Act of 1969, the first major U.S. law that addressed protecting the environment

**NOI**  
Notice of Intent, a formal public notice of DOE's intent to prepare a site-wide EIS, which is published in advance to facilitate timely public involvement

**ROD**  
Record of Decision, a concise public document issued after the completion of a site-wide EIS stating the DOE's decision on the proposed action evaluated in the document

**Scoping**  
the process of inviting public participation in the preparation of an environmental review document, required by NEPA

**Stakeholder**  
any person or organization interested in or affected by activities at a DOE site



A critical aspect of the site-wide EIS process is the scoping meetings, when the Department of Energy (DOE) invites the public's help in defining and refining issues. While the National Environmental Policy Act (NEPA) provides general requirements for public involvement, the DOE has expanded these opportunities by changing the meeting format, having community groups sponsor meetings, providing both afternoon and evening sessions, and advertising in all major area newspapers.

So far, two sets of public meetings in conjunction with the SWEIS have been held in Los Alamos, Española, and Santa Fe—first in the fall of 1994 after the Advance Notice of Intent (ANOI) was published, and again in June of 1995 after the Notice of Intent (NOI). These documents describe the proposed range of the SWEIS. The first meetings were intended to provide information to stakeholders, but the structure left little room for public comments. Experts from LANL gave presentations in several key areas (such as environmental restoration, stockpile stewardship, and waste management) followed by a question and answer period. In general, there was little two-way dialogue. The formal scoping meetings held in June offered a chance for the public to comment on the NOI. The DOE consulted community groups for help in designing a new format. In response to their suggestions, there were no presentations at the scoping meetings. Instead, the bulk of the meetings were devoted to public comment. There was more listening and less talking on the part of LANL and the DOE.

Several misconceptions held by the public became apparent from their comments and concerns. Demanding an end to weapons work, many people believed that the SWEIS could shape national policy, while others feared the study could cause the loss of Laboratory jobs—neither of which is true.

The public suggested the inclusion of a "Green" alternative in the analysis to describe a future Laboratory dedicated to solving environmental problems and developing alternative energy sources. At a special workshop held on July 6th to discuss the "Green" alternative, the DOE was prepared to listen and the stakeholders provided focused, effective input. The meeting's attendees decided the term "Greener" (rather than "Green") better described their alternative: a reduced level of weapons work combined with an increase in non-weapons work, such as technology for environmental clean-up. Some people expressed trust in the Laboratory's ability to handle dangerous materials—such as

plutonium—but demanded that the public be informed ahead of time.

Subsequent meetings are planned to continue this discussion.

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and less talking on the part  
of LANL and the DOE...*

Concurrent with the public scoping meetings, the DOE also held a meeting with several Tribal governments. Because of the Tribes' sovereign status which mandates a government-to-government relationship, this meeting was held separately from the general scoping meetings. (See *Tribal Sovereignty* article, page 4.)

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### Site-Wide EIS: Who Does What?

#### DOE/AL

evaluates the site-wide EIS and issues a Record of Decision

#### Stakeholders

help define the scope of the site-wide EIS and review drafts

#### GRAM, Inc.

consulting firm hired by DOE to perform the analysis of the impacts and to prepare the actual document

#### U/C LANL Site-Wide EIS Project Office

supplies baseline data inventory to DOE/AL and GRAM, Inc.

### Help Us Help You

The Site-Wide EIS Project Office is coordinating this enormous information gathering effort for the Laboratory. The Project Office serves as a single point-of-contact for DOE/AL and the GRAM Team with all Laboratory divisions. All requests for information from DOE/AL or the GRAM Team should be cleared through the Project Office at 665-8969.



## What Makes a *Good* Site-Wide EIS?

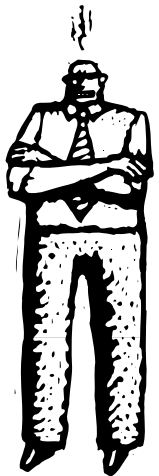
There are certain qualities that characterize a good environmental impact statement. The following questions can help identify whether or not an EIS is effectively accomplishing its intent—and also highlight the immense challenge of a site-wide EIS, which must assess the impacts of a complex, multi-faceted operation:

- Are LANL's current operations adequately described and evaluated?
- Are the alternatives to LANL's current operations adequately described and evaluated?
- Are environmental impacts and risks identified and adequately evaluated?
- Does the document assess individual and cumulative impacts of the continuing and reasonably foreseeable future actions?
- Does the document clearly explain technical and scientific terms and measurements?

## What *Good* Is a Site-Wide EIS?

Some employees have questioned the usefulness of the site-wide EIS, wondering if it's just another "hoop to jump through" or more evidence of unnecessary bureaucratic "red tape." But for several reasons, the site-wide EIS may prove to be the right study at the right time. Consider this:

- The existing site-wide EIS was written in 1979, sixteen years ago. After Tiger Team findings in 1991 showed many national labs lacked NEPA documentation meeting current standards, the DOE decided to institute a number of site-wide and programmatic EISs.
- The purpose of the new site-wide EIS is to provide a comprehensive and cumulative look at the environmental impacts of both ongoing Lab activities and projected activities and operations foreseen within the next five-to-ten years.
- To provide all the baseline data necessary for the site-wide EIS, LANL is organizing and assessing existing records and documentation throughout the Lab, establishing an inventory of information that will be helpful for many years.
- A well-prepared site-wide EIS will enable the Lab to become a better steward of the environment and will be useful as a planning tool. Ideally, it will allow the Lab greater flexibility and efficiency in responding to new projects. The number, complexity, and cost of future NEPA documents should be reduced.



Advance NOI  
Fall 1994



Notice of Intent  
May 1995



Public Scoping  
June 1995

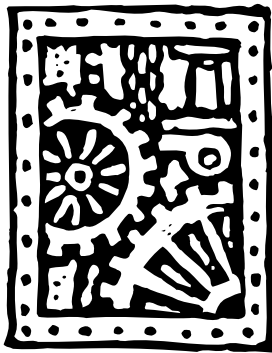


Publish  
Implementation  
Plan



1994

1995



## FOCUS ON FACILITIES

How will all the facilities and operations at the Laboratory be covered in the site-wide EIS? Good question! Ultimately, the approach will be decided by the GRAM Team, but here are some of the factors under consideration:

What the site-wide EIS has to do:

- describe the Laboratory concisely
- describe baseline (current operations)
- describe alternatives for both increased and decreased activities

Ways to do that:

- describe programs that take place in various facilities (the program model)  
*or,*
- describe facilities in which various programs take place (the facilities model)

Why the facilities model should work well:

- facilities remain the same with changing programs
- facilities can be grouped by hazard type to make descriptions easier
- facilities can be analyzed for both increased and decreased operations, as well as accident scenarios

Unlike an EIS for a specific building or project, a site-wide EIS cannot go into detail about all the various facilities and operations at the Laboratory, but must present a more comprehensive look at the Laboratory as a whole. Currently one approach that is being taken by the GRAM Team is to focus on a representative set of facilities that contribute most of the environmental impacts to the air, water, solid wastes, etc. Other facilities are being studied because of their importance to the Lab's overall mission.

Another aspect of this approach entails describing the Lab's various TAs and the types of operations conducted there—for example, administrative, chemical analysis, etc. This could include identifying facilities classified as housing hazardous operations or as being nuclear facilities (as identified by ESH-3 in accordance with DOE guidance). Obviously, there are some facilities—the nuclear ones, for example—that will be described in detail and receive specific analyses in the site-wide EIS.

The current focus on obtaining baseline information on facilities and programs/operations is two-fold:

- Programmatic information affecting facilities is being solicited from various Program Managers and Facilities Managers. At the same time,
- The GRAM Team has been interviewing facility and operations managers for the facilities listed on the left.

If you would like to know more about this process as it evolves, contact Bob Hurdle at the Site-Wide EIS Project Office, 665-8969.

### Some of the Sites Visited by GRAM, Inc.

TA-3-29  
TA-15  
TA-16  
TA-18  
TA-3-66  
TA-43  
TA-46  
TA-50  
TA-53  
TA-54  
TA-55

## SWEIS Update

Since the last Employee Information Quarterly in June, these events have occurred in the Lab's site-wide EIS process:

- the NOI was published in the Federal Register
- public scoping meetings were held in Los Alamos, Santa Fe, and Española
- completion of collection and transfer of baseline data from the Site-Wide EIS Project Office to the consulting firm, GRAM, Inc., charged with analyzing the data and writing the actual document
- GRAM has completed the first round of facility site visits
- Site-Wide EIS Project Office continued support to GRAM through technical teams of experts

## For More Information

### Hotline

Call the LANL Site-Wide EIS Hotline  
**1-800-898-6623**

### Reading Room

The LANL Community Reading Room has a special section devoted to documents relevant to the SWEIS, including written transcripts from the public scoping meetings and the NOI.

1350 Central Avenue  
Suite 101  
Los Alamos  
Phone: 665-2127  
1-800-543-2342

Draft Site-Wide EIS  
Spring 1996



Public Review  
& Comment



Distribute Final  
Site-Wide EIS  
January 1997



Record of  
Decision

1996

1997



## How To Find Us

The Site-Wide EIS Project Office, headed by Doris Garvey, is part of the ESH Division and located in TA-O, Building-1324 in the Small Business Center annex at Eastgate Industrial Park.

Phone: 665-8969  
FAX: 665-8970  
Mail Stop: M889

## Speakers Available

If your division or program office would like more information about the site-wide EIS process and how it will affect you, call the Project Office to schedule an employee "in-reach" program. We can provide speakers for group meetings, brown-bag lunches, or division safety meetings.

## Points-of-Contact

Each Laboratory division and program office has a designated "point-of-contact" for the site-wide EIS process, serving as a liaison to the Project Office. To find out your contact, call Emily Husted at the Project Office at 665-8969.

## What is Environmental Justice?



On February 11, 1994, President Clinton issued an Executive Order designed "to

focus Federal attention on the environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice." In particular, the Administration pledged to prevent those communities "from being subject to disproportionately high and adverse environmental effects."

The Executive Order identifies three initiatives: 1) to enforce existing health and environmental statutes in areas with minority and low-income populations; 2) to improve research and data collection relating to the health and environment of these populations; and 3) to develop greater public participation. As a Federal agency, the DOE has implemented a detailed plan on these initiatives in all agency activities.

Several factors distinguish LANL when considering environmental justice issues: the high concentration of Hispanic citizens living in the region and the Lab's proximity to fifteen American Indian Tribes. In addition, all major routes to Laboratory property—used routinely for transporting hazardous and radioactive materials—pass through Tribal lands.

Environmental justice issues are most appropriately defined by the affected communities themselves—consequently, the environmental justice baseline data being collected by the Lab for analysis by GRAM, Inc., includes public testimony, surveys, all results of the Lab's ongoing public outreach programs, as well as environmental monitoring reports.

*If you or your division have information you would like to include in the environmental justice database, please contact Emily Husted at the Site-Wide EIS Project Office, at 665-8969.*

## What Is Tribal Sovereignty?

There are twenty-two American Indian Tribes in New Mexico, fifteen of which live or have reservation lands within fifty miles of the Laboratory. Each is a self-governing, sovereign entity and maintains a government-to-government relationship with the United States through Federal agencies such as the DOE.

As the original inhabitants of this continent—who were here long before the first Europeans arrived—Indian Tribes have been recognized historically as sovereign nations: communities with inherent rights to their own way of life, culture and governing systems. Their unique relationship with the United States includes the responsibility of the Federal government to provide certain basic assistance and protection to the Tribes in return for the losses of lands and resources they have suffered.

Although Tribal sovereignty has been variously interpreted throughout the existence of the U.S., the basic principle has been upheld and defined in court decisions, treaties, and executive orders—most recently in President Clinton's Executive Memorandum of April 29, 1994, which states that all federal activities "should be implemented in a knowledgeable, sensitive manner respectful of Tribal sovereignty."

Official interactions between the Laboratory, a contracted DOE facility, and the Tribes are conducted on a government-to-government basis by which the sovereign status of the Tribes is recognized. In addition, the DOE signed accords in 1992 with San Ildefonso, Cochiti, Santa Clara, and Jemez pueblos affirming this government-to-government relationship.

*For more information, contact Gil Suazo, Tribal Government Liaison, at 665-1453.*

